



157203

Environmental Technology
of North America, Inc.
A HazWaste Company

Via Facsimile

November 7, 1994

Mr. Jeffrey A. Dodd
U.S. Environmental Protection Agency
Region III
Removal Enforcement Section
303 Methodist Building
11th & Chapline Streets
Wheeling, West Virginia 26003

RECEIVED

NOV 14 1994

WESTERN RESPONSE
SECTION

RE: October 25, 1994 Letter Concerning Potomac Yard Site ECS Work Plan Addendum

Dear Mr. Dodd:

On behalf of Mr. Scott Slagley, Project Coordinator for the Richmond, Fredericksburg & Potomac Railroad Company (RF&P) on the Potomac Yard Site (Docket No. III-92-61-DC), Environmental Technology of North America, Inc. (ETI) requests clarification of certain modifications to the *Extent of Contamination Study Work Plan Addendum* presented in your letter of October 25, 1994. The questions below reference the items and page numbers in your October 25 letter.

Item A (page 3). The third bullet from the end of the list on page 3 requires that MW-6 be shown on Plate 8. This well is, however, located outside Area A-1 in Potomac Greens. To be consistent with EPA's requirements that wells outside Area A-1 be excluded from Plate 8, the modification should delete the reference to MW-6.

Item B.3 (page 5). According to the Region III Risk-Based Concentration (RBC) Table dated 4/18/94 (attached), the residential soil RBC for xylene(s)-total is 160,000 mg/kg. Your letter states the RBC is 16,000 mg/kg. Please confirm which number is correct. If the 4/18/94 RBC table is incorrect, please provide RF&P and ETI a corrected table.

Item H (page 7). The two proposed wells near MW-27 should be renumbered as MW-68 and MW-69 to be consistent with the current numbering of ground water sampling points. Existing ground water sampling points number up to 67.

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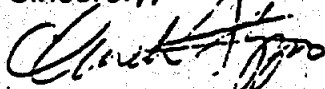
Item J (pages 9-10). Modified section 5.4.3 requires an additional "monitoring well." RF&P proposes to use Direct Push Technology (DPT) instead so a permanent hole (and potential migration pathway) is not left in place. DPT can provide stratigraphic data using geotechnical soundings with resistivity and pore pressure, and can collect a representative water sample.

The Work Plan Addendum includes use of DPT to collect other ground water samples at Potomac Yard. Please confirm whether DPT can be used for the lower aquifer sampling as well.

Please identify what EPA considers to be "elevated levels of contamination" which would cause termination of the drilling, as stated on page 10 of the October 25 letter.

We understand the due date for implementing the Work Plan Addendum modifications to be November 25, 1994 (20 business days from receipt of your letter). ETI is planning to start field work for the sampling required under the modifications the week of November 14. Prior to the start of field work, we will submit to you a field sampling plan which will identify the proposed location of the lower aquifer ground water sampling. In the meantime, we would appreciate your clarification of the matters noted above.

Sincerely,



Chuck Flippo
Senior Scientist

Attachment

cc: Scott Slagley, RF&P

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Source: I=IRIS h=HEAST a=HEAST v=Withdrawn from IRIS or HEAST e=EPA-ECOA o=Other EPA documents

Data of RBC e=carcinogenic effects n=noncarcinogenic effects

Contaminant	CAS	RfDo mg/kg/d	RfDI mg/kg/d	CfSo kg/d/mg	CfSI kg/d/mg	V O	TP water µg/L	Ambient air µg/m ³	Fish mg/kg	Industrial soil mg/kg	Residential soil mg/kg
Tributyltin oxide (TUTO)	55359	3.00E-03 /					1.1	0.11	0.041	31	2.3
2,4,6-Trichloroaniline hydrochloride	33663502			2.90E-02			2.3	0.22	0.11	99	22
2,4,6-Trichloroaniline	639935			3.40E-02			2	0.18	0.093	84	19
1,1,1-Trichloroethylene	134621	1.00E-02 /	5.71E-02				180	210	14	10000	700
1,1,1-Trichloroethane	71556	9.00E-02	2.66E-01				1300	1000	120	92000	7000
1,1,2-Trichloroethane	79005	4.00E-03 /		5.70E-02 /	5.60E-02 /		0.19	0.11	0.035	50	11
Trichloroethylene (TCE)	79016	6.00E-03		1.10E-02	6.00E-03		1.6	1	0.29	260	58
Trichlorofluoromethane	75994	3.00E-01 /	2.00E-01				1300	730	410	310000	23000
2,4,5-Trichlorophenol	93934	1.00E-01 /					3700	370	140	100000	7600
2,4,5-Trichlorophenoxyacetic acid	84062			1.10E-02 /	1.09E-02 /		6.1	0.57	0.29	260	58
2-(2,4,5-Trichlorophenoxy)propionic acid	93765	1.00E-02 /					370	37	14	10000	760
1,1,2-Trichloropropane	93721	8.00E-03 /					290	29	11	8200	630
1,2,3-Trichloropropane	998776	5.00E-03 /					30	18	6.8	5100	390
1,2,3-Trichloropropane	96184	6.00E-03 /		2.00E+02 /			0.0015	0.00089	0.00045	0.41	0.091
1,2,3-Trichloropropene	96195	5.00E-03					30	18	6.8	5100	390
1,1,2-Trichloro-1,2,2-trifluoroethane	76131	3.00E+01 /	8.57E+00				59000	31000	41000	1000000	1000000
Trichloroethane	5013002	3.00E-03 /					110	11	4.1	3100	230
Trichloroethylene	121448		2.00E-03 /				73	7.3			
Trifluorol	1502008	7.50E-03 /		7.70E-03 /			6.7	0.61	0.41	370	43
1,2,4-Trimethylbenzene	95636	5.00E-04					3	1.8	0.48	510	39
1,3,5-Trimethylbenzene	106678	4.00E-04					2.4	1.5	0.54	410	31
Trimethyl phosphate	512561			3.70E-02			1.8	0.17	0.085	77	17
1,3,5-Trinitrobenzene	99354	5.00E-05 /					1.8	0.18	0.068	51	3.9
Trinitrophenylmethylnitramine	479459	1.00E-02					370	37	14	10000	760
2,4,6-Trinitrofluorene	118967	5.00E-04 /		3.00E-02 /			2.2	0.21	0.11	95	21
Uranium (soluble salts)	7440611	3.00E-03 /					110	11	4.1	3100	230
Vanadium	7440622	7.00E-03					260	26	9.5	7200	550
Vanadium pentoxide	1314621	9.00E-03 /					330	33	12	9200	700
Vanadium sulfate	3499743	2.00E-02					730	73	27	20000	1600
Vermin	1929777	1.00E-03 /					37	3.7	1.4	1000	78
Vinclozolin	50471448	2.50E-02 /					910	91	34	26000	2000
Vinyl acetate	108064	1.00E+00	5.71E-02 /				37000	210	1400	100000	76000
Vinyl bromide	593602		8.57E-04 /				5.2	3.1			
Vinyl chloride	75014			1.90E+00	3.00E-01						
Warfarin	81812	3.00E-04 /					0.019	0.021	0.0017	1.5	0.34
m-Xylene	108333	2.00E+00	2.00E-01				11	1.1	0.41	310	23
o-Xylene	95476	2.00E+00	2.00E-01				1400	730	2700	100000	160000
p-Xylene	106423	2.00E+00	2.00E-01				1400	730	2700	100000	160000
Xylene (mixed)	1330207	2.00E+00 /	8.57E-02				520	310			
Zinc	7440666	3.00E-01 /					12000	7300	2700	100000	160000
Zinc phosphide	131447	3.00E-04 /					11000	1100	410	310000	23000
Zincb	12122677	5.00E-02 /					11	1.1	0.41	310	23
							1800	180	68	5100	700

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